

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

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ALICE KIEFT,

Plaintiff,

v.

AMERICAN EXPRESS COMPANY,  
AMERICAN EXPRESS COMPANY LONG  
TERM DISABILITY PLAN, and  
AMERICAN EXPRESS COMPANY LIFE  
INSURANCE PLAN,

Defendants.

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CIVIL ACTION NO.:

04-10949 NMG

**MOTION TO ADJOURN SCHEDULING CONFERENCE (ASSENTED TO)**

Plaintiff, by and through her undersigned counsel, respectfully moves for an order adjourning the scheduling conference in the captioned matter, which is currently scheduled for April 15, 2005, at 3:00 p.m.

As grounds for this motion, Plaintiff's counsel reports that he is currently on trial in the matter of *MacWilliams v. Pentucket School District*, C.A. No. 00-01333 A, before the Essex County Superior Court (Salem). The jury trial commenced on April 5<sup>th</sup> and it is expected that the trial will continue through April 15, 2005, and perhaps be given to the jury on that afternoon.

Counsel for Plaintiff is a solo practitioner, and thus, has no ability to otherwise cover the scheduling conference.

After conferring, counsel for defendants assents to this motion.

Respectfully submitted,

Dated: Haverhill, MA  
April 11, 2005

PLAINTIFF

By her attorney,

LAW OFFICE OF  
STEPHEN L. RAYMOND, ESQ.

By: /s/ Stephen L. Raymond  
Stephen L. Raymond  
3 Washington Square, Ste. 206  
Haverhill, MA 01830  
(978) 372-6590  
BBO #567753

ASSENTED TO:

Defendants,  
American Express Company,  
American Express Company Long Term Disability Plan, and  
American Express Company Life Insurance Plan

By: /s/ Constance M. McGrane  
Constance M. McGrane BBO#  
CONN KAVANAUGH ROSENTHAL PEISCH  
& FORD, LLP  
Ten Post Office Square  
Boston, MA 02109  
(617) 482-8200